



**Solutia Inc.**

575 Maryville Centre Drive  
St. Louis, Missouri 63141

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St. Louis, Missouri 63166-6760  
Tel 314-674-1000

June 19, 2000

Kevin Turner-Environmental Scientist, OSC  
U. S. Environmental Protection Agency  
c/o Crab Orchard National Wildlife Refuge  
8588 Rt. 148  
Marion, IL 62959

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)**  
**Sediment / Soils Removal Action**  
• **Intent to Comply**

Dear Mr. Turner,

Solutia Inc. ("Solutia") is responding to the United States Environmental Protection Agency ("USEPA") pursuant to the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO"), issued to Solutia and Monsanto (Solutia and Monsanto are hereinafter referred to as "Solutia"), requiring Respondents to remove certain affected sediments and soils from Dead Creek and to contain them in an on-site cell.

While this UAO was only issued to Solutia and Monsanto, it is clear that USEPA is well aware that there are other parties liable for contamination in the Sauget Area, as referenced in the UAO itself. Solutia believes that the UAO should have been addressed to all liable parties, but because of the time critical nature of this removal activity, and because of the ongoing recalcitrance of other liable parties, it will move forward to implement the UAO.

On June 13, 2000 at the Sauget Village Hall, Solutia representatives Bruce Yare, Mike Light and Linda Tape, Esq., of Thompson Coburn, met with you and Mike McAteer representing USEPA, Robert Watson and Candi Morin of Illinois EPA ("IEPA"), Kevin de la Bruere of U. S. Fish and Wildlife, and Denise Stoeckel of Illinois Department of Natural Resources. Solutia had requested the meeting to discuss four areas of concern with the UAO: project schedule, resolution of disagreements, access and oversight costs.

With respect to schedule, Solutia presented at the June 13<sup>th</sup> meeting a draft project schedule showing 19 months total duration. Solutia believes that the 19 month schedule represents a reasonably aggressive timeframe in consideration of the project unknowns, unknown weather related constraints, and the fact that the schedule will become enforceable and thus potentially

subject to severe penalties if not strictly followed. At USEPA's request, Solutia will submit within the Time Critical Removal Action Work Plan ("TCRAWP"), due to the Agency July 7, a more aggressive schedule for completion of the UAO Work. However, as was discussed at the meeting, the unfortunate timing of the UAO issuance will result in field work beginning well into the generally accepted construction season for this area. The more aggressive schedule to be included in the TCRAWP submittal will show cell construction beginning in the winter (probably December) and continuing into the Spring of 2001.

As we discussed, winters in the St. Louis area can be highly variable. Your experience over the last year conducting the Site Q removal was not a typical St. Louis winter. More often, there are long periods in the December, January, February timeframe, when the weather conditions would not permit construction of the cell to proceed because adherence to all quality control parameters cannot be maintained. The enforceable, aggressive schedule which will be included in the TCRAWP will assume weather conditions remain favorable throughout December, January and February and cause no delays. This is not likely to occur. Nevertheless, Solutia will submit this aggressive schedule for USEPA approval, based on our understanding that USEPA and Solutia are in agreement that if the weather conditions force delays in the construction of the cell, Solutia will discuss with USEPA and request - as needed - extensions to the approved schedule, and that such extension requests will not be unreasonably withheld.

The discussion on resolution of disagreements was raised by Solutia because the UAO has no process for reconciling differences. Honest and serious differences of opinions can arise. It was suggested by you, that in such an event, Solutia has the option of raising any serious disagreement with your management if initial discussions should reach an impasse. Based on the June 13<sup>th</sup> discussion and on Solutia's experience in working with USEPA in response to the June 28, 1999 UAO to address Dead Creek culverts, Solutia accepts the USEPA position on this matter.

The May 31, 2000 UAO, which became effective June 14, 2000, requires the Respondent to obtain all necessary access agreements within 14 calendar days after the effective date of the Order, which would be June 28. As we discussed, Solutia has already sent 14 letters requesting access agreements with all parties whose agreement we currently believe will be required to implement the UAO. Solutia will make a good faith effort to meet the June 28<sup>th</sup> date. However, based on experience in obtaining access agreements for the Area I January 21, 1999 AOC and the Area I June 28, 1999 UAO, we do not expect to complete the process and obtain signed access agreements from all 14 parties by June 28. As you requested, enclosed as Attachment A is a summary report on the properties where access will be required and where an agreement has been requested. We will continue to update you, monthly at a minimum, to insure that access needs do not hinder the project implementation schedule. In addition, Linda Tape and Tom Martin have spoken further on this item and have agreed that requests and approvals of any time extension for completion of all required access agreements will be documented pursuant to the requirements in the UAO.

Lastly, Solutia raised the question of how the oversight costs of IEPA would be handled. You stated that the IEPA oversight costs associated with the May 31, 2000 UAO will not be invoiced to Solutia.

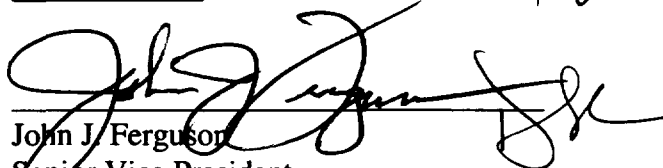
Therefore, pursuant to Section V. ORDER, 1. Notice of Intent to Comply, of the Sauget Sites Area I May 31, 2000 UAO issued to Solutia, requiring Respondents to remove certain affected sediments and soils from Dead Creek and to contain them in an on-site cell, and consistent with the above comments, Solutia hereby provides USEPA Notice of Intent to comply with this Order. In addition, pursuant to Section V. ORDER, 2. Designation of Contractor, Project Coordinator, and On-scene Coordinator, of the UAO, Solutia designates D. Michael Light, Manager, Remedial Projects, Solutia Inc., as the Project Coordinator. Qualifications and address for the designated Project Coordinator are enclosed in Attachment B.

Sincerely,



D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

**Approved by:**



John J. Ferguson  
Senior Vice President  
Integrated Nylon Chain  
Solutia Inc.

cc: (w/enclosure)

Thomas Martin, Esq. - USEPA  
Michael McAteer - USEPA  
Candi Morin - IEPA  
Linda Tape, Esq. - Thompson Coburn

**ATTACHMENT A**

**ACCESS STATUS UPDATE**

## Attachment A - Access Status Update

### **ACCESS AGREEMENTS FOR SOIL/SEDIMENT REMOVAL ACTIVITIES PURSUANT TO 5/31/00 UNILATERAL ADMINISTRATIVE ORDER**

REFERENCE #	PROPERTY OWNER	PARCEL NUMBER	STATUS OF ACCESS AGREEMENT
G1	Cerro Copper Products Company	01-26.0-401-014 01-26.0-401-015	<ul style="list-style-type: none"> <li>Access Agreement forwarded via e-mail 6/9/00.</li> </ul>
G2 G3	Harold Wiese	01-26.0-401-003 01-26.0-401-004	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> </ul>
G4	Andrew Hankins (c/o James Hankins)	01-26.0-401-011	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> </ul>
G5	Emily Hankins	01-26.0-401-006	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> </ul>
L1	Metro Equipment Construction, Inc. (Tony Lechner)	01-35.0-200-034	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> <li>Signed access addendum (dated 6/9/00) received.</li> </ul>
L2 L5 L3	L. Keeley Paving & Construction Co. L. Keeley Land Trust	01-35.0-200-035 01-35.0-200-036 01-35.0-200-033	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> <li>6/9/00 letter from R. Striler noting that access addenda had been forwarded to L. Keeley and requesting that Solutia call L. Keeley re access needs.</li> </ul>
L4 L6	Ruan Transport Corp.	01-35.0-200-013 01-35.0-200-031	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> <li>6/13/00 telephone call with D. Hermeling re access needs; requested conference call with Solutia re description of work.</li> <li>6/14/00 maps of parcels forwarded to D. Hermeling.</li> </ul>

**Attachment A - Access Status Update**

**ACCESS AGREEMENTS FOR SOIL/SEDIMENT REMOVAL ACTIVITIES  
PURSUANT TO 5/31/00 UNILATERAL ADMINISTRATIVE ORDER**

REFERENCE #	PROPERTY OWNER	PARCEL NUMBER	STATUS OF ACCESS AGREEMENT
CSB6	Albert Lauman	01-35.0-202-016	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> </ul>
CSC7	Amrut Patel	01-35.0-102-003	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> <li>6/12/00 telephone call from A. Patel re access.</li> <li>6/13/00 original Access Agreement faxed to A. Patel.</li> </ul>
CSE5 CSE6 CSE35	South Cahokia Jaycees	01-35.0-311-002 01-35.0-311-003 01-35.0-307-022	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> </ul>
CSE20 CSE38 CSE39	St. Louis University (Parks College)	01-35.0-305-036 01-35.0-305-027 01-35.0-305-035	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> </ul>
CSE22 CSE23	St. Clair County	06-30.0-206-001* 06-30.0-206-002* *incorrect parcel numbers  Per St. Clair County, correct parcel numbers are: 06-03.0-206-001 06-03.0-206-002	<ul style="list-style-type: none"> <li>Letter requesting access forwarded 6/8/00.</li> <li>6/12/00 telephone call re parcel numbers (incorrect).</li> <li>6/13/00 map of parcels faxed to County.</li> <li>6/14/00 telephone call - correct parcel numbers are: 06-03.0-206-001 06-03.0-206-002</li> </ul>

**Attachment A - Access Status Update**

**ACCESS AGREEMENTS FOR SOIL/SEDIMENT REMOVAL ACTIVITIES  
PURSUANT TO 5/31/00 UNILATERAL ADMINISTRATIVE ORDER**

REFERENCE #	PROPERTY OWNER	PARCEL NUMBER	STATUS OF ACCESS AGREEMENT
CSE24 CSE25	State of Illinois	06-30.0-205-001 06-30.0-205-002	• Letter requesting access forwarded 6/8/00.
CSF1 CSF2 CSF3 CSF4 CSF6 CSF7	Village of Cahokia	06-03.0-208-001 06-03.0-208-002 06-03.0-207-001 06-03.0-207-002 06-03.0-204-001 06-03.0-203-001	• Letter requesting access forwarded 6/8/00.

## **ATTACHMENT B**

### **Qualifications of D. Michael Light for Project Coordinator**

#### **1. Academic Experience**

- BS Chemical Engineering, West Virginia University, 1968

#### **2. Related Professional Experience**

- 32 year employee of Monsanto / Solutia
- 24 years project management and manufacturing management in Monsanto Specialty chemicals plant, Nitro, WV

#### **3. CERCLA Experience**

- 8 years Superfund project management, Monsanto / Solutia
- 8 years Project Coordinator with lead PRP at Industri-Plex Superfund Site, Woburn, MA for the Industri-Plex Site Remedial Trust - Region I
- Project Coordinator for Sauget Sites Area I, January 21, 1999 AOC for the EECA / RIFS.

#### **4. References**

- Joseph F. LeMay, P. E. , Industri-Plex Superfund Site RPM - 1995 to Present)  
Address: Joseph F. LeMay, P. E.  
Remedial Project Manager  
US EPA, Office of Site Remediation and Restoration  
1 Congress St.  
Suite 1100 (HBO)  
Boston, MA 02114-2023  
Tel: (617) 918-1323  
FAX: (617) 918-1291
- Mr. Michael McAteer, Sauget Sites RPM - 1998 to present  
Address: Mr. Michael McAteer (SR-6J)  
U. S. EPA - Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
(312) 886-4663 (FAX: 4071)



**ADDRESS**

Mail address:

Michael Light (6S)  
Solutia Inc.  
P. O. Box 66760  
St. Louis, MO 63166-6760  
Phone No: (314) 674-1617

Address for packages, fed-ex, etc:

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